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June 20, 2021

VIA ECF

Hon. Naomi R. Buchwald
U.S. District Judge
U.S. District Court, S.D.N.Y.
500 Pearl Street
New York, NY 10007

RE: United States v. Rayquan Turner, 20-cr-302 (NRB)

Dear Judge Buchwald:

I write on behalf of my client, Rayquan Turner, who is scheduled to be sentenced in the above-referenced matter tomorrow, June 21, 2021, to correct an inadvertent error in the defense sentencing memorandum dated June 9, of which I just became aware.

In connection with a discussion of Mr. Turner's intervention in a fight at the New York Metropolitan Correctional Center, page 14 of the memorandum mistakenly states that Courts in this District have held that heroic conduct like Mr. Turner's warrants favorable consideration under 18 U.S.C. § 3553(a), relying on *United States v. Haynes*, and mis-cites *Haynes* as 456 F. Supp. 3d 496 (S.D.N.Y. 2020). While *Haynes* supports this general proposition, it is a case in the Eastern District of New York, not the Southern District. I apologize for the error.

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Respectfully submitted,

s/ Jocelyn E. Strauber

cc: Assistant U.S. Attorney Allison Nichols (via ECF)
Assistant U.S. Attorney Jamie E. Bagliebter (via ECF)